

SONIA MARTIN (State Bar No. 191148)
KIMBERLY DE HOPE (State Bar No. 215217)
SONNENSCHN NATH & ROSENTHAL LLP
525 Market Street, 26th Floor
San Francisco, CA 94105-2708
Telephone: (415) 882-5000
Facsimile: (415) 882-0300

Attorneys for Defendant
WILLIAMS LEA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SANDRA CHEW,

Plaintiff,

vs.

WILLIAMS LEA, INC., CHARLOTTE
DOLLY, and DOES 1 through 100,
inclusive

Defendants.

No. C07-3525 CRB

DECLARATION OF CHARLOTTE DOLLY
IN SUPPORT OF WILLIAMS LEA'S
OPPOSITION TO PLAINTIFF'S MOTION
TO REMAND

Date: August 24, 2007

Time: 10:00 a.m.

Place: Crtm. 8, 19th Fl.

Before: Hon. Charles R. Breyer

I, Charlotte Dolly, declare:

1. I am over the age of 21 years and a resident of the State of California.

2. I am an Account Operations Manager for defendant Williams Lea Inc. ("Williams Lea"), and have been for approximately one year. I make this declaration in support of Williams Lea's Opposition to Plaintiff's Motion to Remand. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently to them.

3. Williams Lea is a company engaged in the business of providing corporate information solutions to a variety of businesses and industries. Among its many client industries, Williams Lea provides outsourced information services to a variety of law firms.

1 Among its many law firm clients, Williams Lea has provided document support services to the
2 law firm of Heller Ehrman LLP ("Heller Ehrman") in San Francisco since 2006 pursuant to a
3 vendor contract between the two entities. In connection with Williams Lea's contract with
4 Heller Ehrman, Williams Lea employees are located at Heller Ehrman's law offices and work
5 closely with Heller Ehrman's staff to provide on-site services and support. Since August 7,
6 2006, I have been the manager assigned to oversee Williams Lea's support services for the San
7 Francisco office of Heller Ehrman.

8 4. I was Sandra Chew's manager while she worked for Williams Lea. In the course of
9 performing my job responsibilities as her manger, I discussed her employment and termination
10 with certain other individuals at Williams Lea and Heller Ehrman. Below, I describe the
11 substance of my statements to those individuals, to the best of my recollection.

12 5. On or about March 28, 2007, I learned that Ms. Chew was suspected of falsifying
13 her time records for March 27, 2007. I was tasked with helping to investigate that suspicion. As
14 part of my investigation, I spoke with Laura Knight, Heller Ehrman's Secretarial Manager, to
15 obtain records reflecting the actual times Ms. Chew entered the building and logged into her
16 computer on March 27, 2007. I informed Ms. Knight that Ms. Chew was suspected of falsifying
17 time records, and that I needed the building access and computer log in information to
18 investigate the allegation. In one or more subsequent conversations, I discussed with Ms.
19 Knight the logistical aspects of terminating Ms. Chew and escorting her off the premises.

20 6. Travis White is the Heller Ehrman employee who was tasked with determining
21 what time Ms. Chew logged into her computer on March 27, 2007. I spoke with him regarding
22 the log in time on Ms. Chew's computer, but I do not recall whether I advised him of the reason
23 for the investigation.

24 7. In addition, I briefly discussed Ms. Chew's termination with Jean Jones, Heller
25 Ehrman's Administrator. During that conversation, Ms. Jones mentioned she was aware of the
26 termination. I do not recall telling Ms. Jones the reason for Ms. Chew's termination.

27 8. The only other individuals with whom I spoke about Ms. Chew's termination were
28 Katie Garcia, Ms. Chew's supervisor, Joe Hebel, an employee in Williams Lea's Human

Resources Department and Scott Spranger, Williams Lea's National Client Services Director. We discussed the investigation leading to Ms. Chew's termination and the procedure to follow in advising Ms. Chew of the termination.

9. I have not discussed the circumstances of Ms. Chew's termination with any other employees of Williams Lea or Heller Ehrman. Nor have I discussed Ms. Chew's termination or my opinions concerning her performance as an employee with anyone outside Williams Lea or Heller Ehrman, with the exception of my counsel.

10. I have never told anyone that Ms. Chew was a "troublemaker," nor have I stated that she was "dishonest," "lazy," or "incompetent."

11. I made the statements described in this declaration because I believed I needed to communicate regarding such personnel matters with employees of Williams Lea and Heller Ehrman in order to perform my job duties as an account operations manager employed by Williams Lea in an office servicing Heller Ehrman. I have never acted with malice toward Ms. Chew, nor do I have any animosity towards her. I bear no hatred or ill will towards Ms. Chew.

12. The only documents I have seen reflecting the basis for Ms. Chew's termination were created in the course and scope of Williams Lea's and Heller Ehrman's human resources operations.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on August 1, 2007, at San Francisco, California.


Charlotte Dolly